

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ROSE AMOUGOU NGASSAM :
Plaintiff,
v.
MICHAEL CHERTOFF,
Secretary of Department of Homeland
Security; EMILIO GONZALEZ,
Director of United States Citizenship &
Immigration Services, F. GERARD
HEINAUER, Director of the Nebraska
Service Center of United States
Citizenship & Immigration Services

Defendants.

Case No: 07 Civ. 8172 (LLS)

**NOTICE OF MOTION FOR
RECONSIDERATION/REARGUMENT**

PLEASE TAKE NOTICE that on the _____ day of October 2007, at _____ a.m. or
as soon thereafter as counsel may be heard, attorneys for Plaintiff, shall move, before the
Honorable Louis L. Stanton, U.S.D.J., United States Courthouse, Room 21C, 500 Pearl Street,
New York, New York, 10007, for the entry of an Order in the form submitted herewith, granting
reconsideration of the Court's September 19, 2007 sua sponte dismissal of Plaintiff's complaint
for lack of subject matter jurisdiction and denial of Plaintiff's Order to Show Cause for
Preliminary Injunction, and reinstating Plaintiff's Complaint and Order to Show Cause.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Plaintiff shall rely
upon this Notice of Motion and a Memorandum of Law in Support of Plaintiff's Motion to
Reconsider.

PLEASE TAKE FURTHER NOTICE that counsel for Plaintiffs hereby requests oral argument.

Respectfully Submitted,

/s/

**SETON HALL UNIVERSITY SCHOOL OF LAW
CENTER FOR SOCIAL JUSTICE**

Attorney for Plaintiff
By: Bryan Lonegan Esq.
Jenny-Brooke Condon, Esq.
Jisun Chang, Student Intern
Gal Davidovitch, Student Intern